

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CRIM. NO. 04-30046-MAP

UNITED STATES OF AMERICA,

v.

PASQUALE ROMEO, ET AL
Defendants

MOTION OF DEFENDANT PASQUALE ROMEO
TO EXTEND STAY FOR SELF REPORTING

Defendant herein requests that the imposition of sentence be stayed until January 5, 2007 and that he be ordered to self report to the facility designated by the Bureau of Prisons on that date. In support hereof defendant sets forth the following:

1. Defendant has currently been ordered to report on December 8, 2006.
2. Undersigned counsel on this date has spoken with the U.S. Marshall Service and learned that no designation has yet been made. He further learned that the Bureau of Prisons has been behind in making those designations and that in fact designation may not be made by December 8th.
3. Defendant's sister is gravely ill with a terminal illness. Her condition deteriorated significantly within the last month. She substantially relies on defendant for comfort and support. Defendant wishes to remain accessible to her in her last days.

WHEREFORE, defendant requests a stay for his self-reporting to the designated facility until January 5, 2007.

THE DEFENDANT
By His Attorney

/s/ Michael O. Jennings
Michael O. Jennings, Esq.
73 Chestnut Street
Springfield, MA 01103
(413) 737-7349
BBO# 251340

CERTIFICATE OF SERVICE

I, Michael O. Jennings, hereby certify that I electronically served a copy of the foregoing motion on all parties of record on December 6, 2006.

/s/ Michael O. Jennings
Michael O. Jennings, Esq.